



May 8, 2012

Eric Daly
On-Scene Coordinator
United States EPA Region 2
2890 Woodbridge Avenue
Edison, New Jersey 08837

Eric,

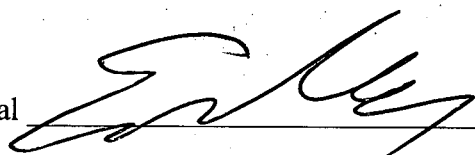
The letter is being written to formally address the off-specification transportation and disposal through subcontracted services with Capitol Environmental Services, Inc. The waste stream in question is the final 3300 gallon load of fluid materials loaded out from the rental storage tank number 4 at the Riverside Avenue project site. The waste profile prepared for this waste stream referenced the original analysis which revealed a presence of approximately 1-4% of sediments in the waste stream. The final load shipped from this tank actually contained 22% sediments as shown in the analysis received from the treatment facility.

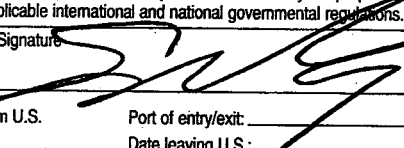
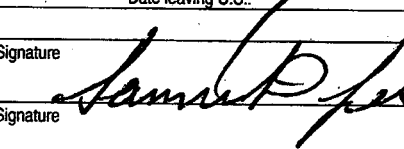
The original price of the treatment and disposal in the subcontracted rate was \$0.22 per gallon for the waste stream. The new cost is \$0.85 to treat and dispose of the materials. KEMRON is requesting approval of surcharge payment for the treatment and disposal of this waste stream and have attached the backup documentation required by subcontract with Capitol Environmental Services, Inc.

Sincerely,

Kevin Shaver
Response Manager

OSC Signature of Approval
May 8, 2012


ERIC M. DALY FOR USEPA

NON-HAZARDOUS WASTE MANIFEST		1. Generator ID Number NJP 000 916 304	2. Page 1 of 1	3. Emergency Response Phone 9084201707	4. Waste Tracking Number 1838 FT 403	
5. Generator's Name and Mailing Address US EPA Region 2-Riverside Avenue Site 2890 Woodbridge Ave., Bldg 205, (MS-211), Edison, NJ 08837			Generator's Site Address (if different than mailing address) 29 Riverside Ave., Newark, NJ 07104			
Generator's Phone: (732) 321-4350 Attn: Eric Daly						
6. Transporter 1 Company Name Environmental Recovery Corporation of PA			U.S. EPA ID Number PAD 987 266 749			
7. Transporter 2 Company Name			U.S. EPA ID Number			
8. Designated Facility Name and Site Address Environmental Recovery Corporation of PA 1076 Old Manheim Pike, Lancaster, PA 17601			U.S. EPA ID Number PAD 987 266 749			
Facility's Phone: (717) 393-2627						
9. Waste Shipping Name and Description			10. Containers		11. Total Quantity	12. Unit Wt./Vol.
			No.	Type		
1. Non RCRA, Non DOT Regulated Liquid, N.O.S., (Water)			001	TT	est 3300	G
2.						
3.						
4.						
13. Special Handling Instructions and Additional Information 1: EMERGENCY CONTACT INFORMATION: OSC ERIC Daly, 9084201707 Job# ROAN-SSCH-0745-8.145						
14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded; and are in all respects in proper condition for transport according to applicable international and national governmental regulations.						
Generator's/Offor's Printed/Typed Name ERIC DALY FOR USEPA			Signature 		Month Day Year 5 1 12	
15. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.			Port of entry/exit: Date leaving U.S.:			
16. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name Samuel DeJesus			Signature 		Month Day Year 5 1 12	
Transporter 2 Printed/Typed Name			Signature		Month Day Year	
17. Discrepancy						
17a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
Manifest Reference Number:						
17b. Alternate Facility (or Generator)			U.S. EPA ID Number			
Facility's Phone:						
17c. Signature of Alternate Facility (or Generator)			Month Day Year			
18. Designated Facility Owner or Operator. Certification of receipt of materials covered by the manifest except as noted in Item 17a						
Printed/Typed Name:			Signature		Month Day Year	

ENVIRONMENTAL RECOVERY CORP

1076 Old Manheim Pike

Lancaster, PA 17601

(717) 393-2627

PA DEP

Environmental Laboratory

Registration # 36-1696

LAB PROFILE REPORT

2 SAMPLE (Incoming)

SAMPLE IDENTIFICATION

Gencode: 2-050112-10

Transport: ERC

Test Date: 5/1/2012

Generator: US EPA

TEST DATA

BASIC PROFILE

Sample State:	Liquid
pH:	4.91
Treatment:	No
BSW (%):	96
H2O (%):	94
Flash Point (deg. F):	>140
TOX (ppm):	153
Solvent Scan:	--
PCB (ppm):	ND
Acceptability:	Acceptable

TOTAL METALS

As	Ni
Cd	Pb
Cr	Mo
Cu	Zn

Remarks

Red organic grease like layer. Does not waste water treat. Large mud layer that settled out before spinning. Did not go into solution. Visual BS&W 96/74, 22% Solids.

I HEREBY CERTIFY THAT ALL INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS IS COMPLETE AND ACCURATE TO THE BEST OF MY KNOWLEDGE, AND THAT ALL KNOWN OR SUSPECTED HAZARDS HAVE BEEN DISCLOSED.

AUTHORIZED SIGNATURE
KERMIT BURKHOLDER

TITLE
LAB DIRECTOR

Wednesday, May 02, 2012

Kevin Shaver

From: Susan Schult [susan.schult@capitol-environmental.com]
Sent: Thursday, May 03, 2012 9:18 AM
To: Kevin Shaver
Subject: FW: US EPA-Riverside Ave. Site---Newark,NJ Off-Spec. Load on 5/1/12
Attachments: US EPA 001.jpg; US EPA 002.jpg; USEPA-Riverside Ave. ERC Lab Report.pdf

Kevin-

Attached are the documents we spoke about yesterday regarding the off-spec. load from the US EPA-Riverside Ave., Newark, NJ site from 5/1/12. Attached are 2 pictures of the load sample showing the red grease-like material that came in along with the load lab report. The load also had a layer of mud/solids and the solids were 22% according to the lab. The ERC profile submitted had the sediment content at 1-4%. Also, this load was not compatible with ERC's waste water treatment process and therefore had to be sent to pit stabilization.

The new price for processing the 3300 gallons on this load is \$0.85/gallon. The material will be stabilized and sent to subtitle D landfill.

Please reply after you have reviewed the documents attached to let us know that the off-spec charge is ok based on the lab results at the receiving facility.

Call me if any questions.

Thanks

Susan M. Schult
Capitol Environmental Services, Inc.
301-218-6607
301-218-6612 fax
703-407-2402 mobile
susan.schult@capitol-environmental.com

Kevin Shaver

From: Janelle Murphy
Sent: Tuesday, May 08, 2012 9:15 AM
To: Kevin Shaver
Subject: FW: CERCLA Compliance Check

Janelle Murphy

Transportation and Disposal Coordinator
404-601-6939 (direct) 404-808-3769 (mobile)
jmurphy@kemron.com

KEMRON Environmental Services Inc.

1359-A Ellsworth Industrial Blvd
Atlanta, GA 30318
404-636-0928 (office) 404-636-7162 (fax)

Visit us at www.kemron.com

From: Gary Morton [<mailto:Morton.Gary@epamail.epa.gov>]
Sent: Tuesday, May 08, 2012 9:13 AM
To: Janelle Murphy
Subject: Re: CERCLA Compliance Check

The Modern Landfill located in York, PA is acceptable to receive waste. Please contact the facility to make all necessary arrangements prior to sending waste to the facility.

▼ "Janelle Murphy" ---05/08/2012 09:09:52 AM---Mr. Morton,

From: "Janelle Murphy" <jmurphy@kemron.com>
To: Gary Morton/R3/USEPA/US@EPA
Date: 05/08/2012 09:09 AM
Subject: CERCLA Compliance Check

Mr. Morton,

I am writing to request a CERCLA Compliance Check. Please see attached documents for detailed request.

Thank you,
Janelle

Janelle Murphy

Transportation and Disposal Coordinator
404-601-6939 (direct) 404-808-3769 (mobile)
jmurphy@kemron.com